

Application No. 09/774,074
Response to 09/06/2005 Advisory Action

Attorney's Docket No. 10006308-1

REMARKS

Claims 1-20 are pending, and continue to stand rejected for obviousness over Fall in combination with various ones of Lermant, Bates, and "Applicant's described Background Art".

Fall discloses that "data objects [like text] are stored . . . corresponding to the bands of the page". Fall, col. 10, ll. 35-36. The Advisory Action cites these lines of Fall in the middle of its page 2 to support its conclusion that Applicant's arguments, most recently presented in the Response filed on August 10, 2005, are "not persuasive".

But the correspondence of objects-to-bands disclosed in Fall is precisely the inverse of the correspondence required by the pending claims. Claim 1, for example, recites that "each region of the plurality of regions corresponds to text having the same color".

This difference between Fall and the claims has been pointed out repeatedly during the prosecution of this application. Fall's "bands" 112 are merely non-overlapping rectangular areas that do not correspond to underlying objects, as is clear from simple inspection of for example Fall's FIG. 2d, showing bands 424-1, 424-2 and 424-3. In Fall, it is underlying objects that correspond to the bands. Applicants' inverse of Fall's correspondence serves to preserve text color information at the same time as it eliminates the need for a separate color layer, as explained in this application at page 5, line 3 et seq., among other places.

The deficiencies of Fall are not remedied by either Lermant or Bates or "Applicant's described Background Art" as explained previously, and so these remarks need not be repeated here.

It is again respectfully submitted that the cited combinations do not describe all of the elements of Applicants' claims, and thus these combinations fail as bases for *prima facie* cases of obviousness against the claims.

It is also believed that the cited documents would not have supplied any motivation to combine them as suggested by the Advisory Action or previous Actions and that there would have been no reasonable expectation that such complex documents could be successfully combined to yield a working system, which even then would have had to be further modified to obtain the claimed subject matter. In view of

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the significant differences between the subject matters claimed and the citations, it is unnecessary to discuss in detail these other requirements of a *prima facie* case of obviousness.

Accordingly, it is again respectfully requested that the obviousness rejections be reconsidered and withdrawn and that this application be allowed. If the Examiner has any questions, the undersigned attorney may be telephoned at the number given below.

Respectfully submitted,



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Filed September 12, 2005

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